FILED IN THE DISTRICT COURT
ROGERS COUNTY OKLAHOMA

MAY 21 2012

CANDI CZAPANSKY, COURT CLERK

DEPUTY

IN THE DISTRICT COURT FOR ROGERS COUNTY
STATE OF OKLAHOMA

RHONDA OLIVERA,   )
)
        Plaintiff,   )
)
vs.   )   Case CJ-2011-70
)
LINDA MOORE and AMERICAN   )
COMMERCE INSURANCE COMPANY)
)
        Defendants.   )

AMENDED PETITION

COMES NOW the Plaintiff Rhonda Olivera, by and through her attorneys Bret A. Smith and Rick Paynter and for her cause of action against the Defendants alleges and states as follows:

1. That the accident which is the subject matter of this litigation occurred in Rogers County, Oklahoma on the 1st day of April, 2009.

2. That the Defendant negligently failed to yield the right of way to Plaintiff causing the collision with Plaintiff Rhonda Olivera.

3. That the Defendant's negligence was the direct and proximate cause of the personal injuries sustained by the Plaintiff.

4. That the Defendant Linda Moore received a citation for failure to yield indicating negligence per se.

5. That the Plaintiff sustained severe physical injuries, pain and suffering, and medical bills due to the negligence of the Defendant Linda Moore.

6. That the Plaintiff had un/underinsured motorists coverage under a policy with American Commerce Industry Company, policy #11-002158490.

EXHIBIT

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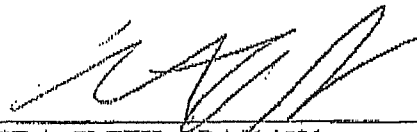7. That the Defendant Linda Moore has no objection to this amended Petition.

WHEREFORE, premises considered, Plaintiff Rhonda Olivera prays that she have Judgment against the Defendant Linda Moore in an amount in excess of Seventy Five Thousand Dollars, jointly and severally, for personal injuries, pain and suffering and medical bills and any further relief to which she may be entitled.

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